

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Criminal No. 1:11-cr-00091 JMS-TAB-01
DINA WEIN REIS,)
Defendant.)

**MOTION BY DEFENDANT DINA WEIN REIS FOR PERMISSION
TO TRAVEL OUTSIDE THE UNITED STATES**

Defendant Dina Wein Reis, by counsel J. Richard Kiefer, hereby moves the Court for permission to travel outside the United States and states the following in support thereof:

1. This Court sentenced Ms. Reis on May 13, 2013 to nineteen (19) months in prison followed by one (1) years of supervised release. [Dkt. 45] Ms. Reis has served her sentence with the Bureau of Prisons. She was released from the Bureau of Prisons facility in Danbury, Connecticut on March 19, 2014 to a halfway house in New York. She satisfactorily completed both her prison sentence and her halfway house confinement and was released to supervised release on December 24, 2014. Therefore, her supervised release is scheduled to end on December 24, 2015.

2. Ms. Reis is currently employed by two-family owned businesses that require travel outside the United States. She has discussed her need to travel outside the United States with her probation officer, who has no objection to such travel.

3. The undersigned counsel has advised Assistant United States Attorney Winfield Ong of this request and Mr. Ong has authorized the undersigned counsel to advise the Court that the government does not oppose this motion.

4. Ms. Reis surrendered her passport to Pretrial Services and does not currently have a passport. The passport that she surrendered has now expired. She therefore requests permission of the Court to apply for and maintain a United States passport.

5. Ms. Reis requests that this Court authorize her to travel outside the United States, subject to submission to United States Probation of her travel plans, including her itinerary, dates of travel, where she will travel to and the duration of her stays, where she will be staying in each country, and relevant contact information. Ms. Reis requests that this Court authorize U.S. Probation to approve individual trips.

WHEREFORE, Defendant Dina Wein Reis prays that the Court approve her travel outside the United States subject to approval of individual trips by United States Probation and permit her to apply for and maintain a United States passport.

Respectfully submitted,

/s/ J. Richard Kiefer
J. Richard Kiefer, Attorney No. 5176-49
BINGHAM GREENEBAUM DOLL LLP
10 West Market Street
Suite 2700
Indianapolis, Indiana 46204
Counsel to Defendant Dina Wein Reis

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Winfield Ong
UNITED STATES ATTORNEY'S OFFICE
Winfield.Ong@usdoj.gov

Matthew A. Klecka
U.S. DEPARTMENT OF JUSTICE
Matthew.Klecka@usdoj.gov

Michael S. Sommer
WILSON SONSINI GOODRICH & ROSATI
msommer@wsgr.com

James H. Voyles
VOYLES ZAHN PAUL HOGAN & MERRIMAN
jvoyles@vzphmlaw.com

Thomas A. Brodnik
STARK DONINGER & SMITH
tbrodnik@sdsfirm.com

Joseph DiBlasi
jdibl@arkin-law.com

Robert W. Hammerle
HAMMERLE & CLEARY
hammerleandallen@ameritech.net

Juval O. Scott
INDIANA FEDERAL COMMUNITY DEFENDERS
juval.scott@fd.org

Jeffrey Allen Baldwin
BALDWIN DAKICH & MAXWELL
jbaldwin@quest.net

/s/ J. Richard Kiefer

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